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UNITED STATES BANKRUPTCY COURT		
DISTRICT OF NEW JERSEY		
Caption in Compliance with D.N.J. LBR 9004-2(c)		
Law Offices of Seymour Wasserstrum 205 W. Landis Ave Vineland, NJ 08360 856-696-8300 856-696-3586 Attorney for Debtor(s) Kborger@seymourlaw.net		
In Re:	Casa No.	16 12401
in Ke:	Case No.: _	16-13401
Margarita Pagan	Judge: _	ABA
	Chapter: _	13

## CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO CREDITOR'S MOTION FOR RELIEF

The debtor in the above captioned chapter 13 proceeding hereby objects to the following

1.	Motion	for Relief from Stay	
	By	The Bank of New York Mellon	, creditor

2. I am objecting to the above for the following reasons:

I would like the opportunity to cure the arrears.

I would like to propose curing the arrears by including them into the chapter 13 plan.

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- 3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
- 4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 7/18/2017 /s/ Margarita Pagan

Debtor's Signature